

Exhibit F

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 FLOYD'S OF LEADVILLE, INC., n/k/a VALUED, INC.,

4 Plaintiff,

5 -v- No. 1:22-cv-03318

6 ALEXANDER CAPITAL, LP; NESA MANAGEMENT LLC;
7 JOSEPH ANTHONY AMATO; ROCCO GERARD
8 GUIDICIPIETRO; JONATHAN GAZDAK; GREGORY F.
9 HURLEY; HOWARD DASILVA; RONALD BARRIE CLAPHAM;
MARK DAVID LEONARD; THIEN TRUONG; PROVISION
HOLDING INC., TIMOTHY KELLY; and THREE DDD LLC,

10 Defendants.

11
12
13 REMOTE VIDEOCONFERENCE DEPOSITION OF
14 ALEXANDRA MERLE-HUET, a Witness herein, taken by
15 the Defendant, on Wednesday, September 4, 2024,
16 at 11:30 a.m., before Jeffrey Shapiro, a
17 Stenographic Reporter and Notary Public, within
18 and for the State of New York.
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1 A P P E A R A N C E S :

2 HOLCOMB & WARD, LLP

3 Attorneys for the Witness

4 3455 Peachtree Road, Suite 500

5 Atlanta, Georgia 30326

6 BY: BRYAN WARD, ESQ.
7 HOLLY COLE, ESQ.
8 AARON WRIGHT, ESQ.

9
10 LAW OFFICE OF PAUL RACHMUTH, ESQ.

11 Attorneys for the Defendants RONALD BARRIE
12 CLAPHAM and MARK DAVID LEONARD

13 265 Sunrise Highway, Suite 62

14 Rockville Centre, New York 11570

15 BY: PAUL RACHMUTH, ESQ.

16 VEDRA LAW, LLC

17 Attorneys for the Plaintiff

18 1444 Blake Street

19 Denver, Colorado 80202

20 BY: DANIEL VEDRA, ESQ.

21
22 Also Present:

23 GEORGE ELLIS, Videographer
24
25

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5
6 IT IS HEREBY STIPULATED AND AGREED by
7 and between the attorneys for the respective
8 parties hereto, that the filing, sealing and
9 certification be, and the same are hereby
10 waived;

11
12 IT IS FURTHER STIPULATED AND AGREED
13 that all objections, except as to the form of
14 the questions, shall be reserved to the time of
15 the trial;

16
17 IT IS FURTHER STIPULATED AND AGREED
18 that the within examination may be subscribed
19 and sworn to before any notary public with the
20 same force and effect as though subscribed and
21 sworn to before this Court.
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23
24
25

Merle-Huet

(Time noted: 11:40 a.m.)

(A videographer was requested. A
recess was taken.)

(Time noted: 12:13 p.m.)

THE VIDEOGRAPHER: We are now on the
record. The time is 12:13 p.m., Eastern
Time, on September 4th, 2024. This
begins the video conference deposition of
Alexandra Merle-Huet, taken in the matter
of Floyd's of Leadville, Incorporated,
n/k/a Valued, Incorporated versus
Alexander Capital LP, et al. The case
number is 1:22-CV-03318-DEH, and it's
filed in the United States District Court
Southern District of New York.

My name is George Ellis, and I'm
your remote videographer. Our court
reporter is Jeffrey Shapiro, and we are
representing Esquire Deposition
Solutions.

Counsel, please state your name and
who you represent, after which the court
reporter will swear in the witness.

MS. COLE: Good morning. This is

1 Merle-Huet

2 Holly Cole at Holcomb & Ward. Also with
3 me here remotely are Bryan Ward and Aaron
4 Wright. And We represent Alexander
5 Capital, Nesa Management, Joseph Amato,
6 Rocco Guidici Pietro and Jonathan Gazdak.

7 MR. RACHMUTH: This is Paul
8 Rachmuth. Paul Rachmuth Law Office PLLC,
9 representing Barrie Clapham and Mark
10 Leonard.

11 MR. VEDRA: Good morning. This is
12 Dan Vedra on behalf of the plaintiff
13 Lloyd's of Leadville, also appearing on
14 behalf of the witness, Alexandra
15 Merle-Huet.

16 THE VIDEOGRAPHER: Will the reporter
17 swear in the witness?

18 THE REPORTER: Would you raise your
19 right hand?

20 (The witness complied.)

21 Do you swear that your testimony
22 today shall be the truth, the whole
23 truth, and nothing but the truth?

24 THE WITNESS: I do.

25 THE REPORTER: State your name and

Merle-Huet

address for the record.

THE WITNESS: Alexandra Merle-Huet.

61 Stoneyside Drive, Larchmont, New York
10538.

DIRECT EXAMINATION

BY MS. COLE:

Q. Good morning, Ms. Merle-Huet. Is
there anyone present in the room with you this
morning?

A. Just my dog.

Q. Okay. An initial matter, if I say
"FOL," will you understand that I'm referring
to Floyd's of Leadville, also known as Valued,
Inc.?

A. I'm sorry, can you repeat that?

Q. Sure. I'm going to refer to
Floyd's of Leadville as FOL, with the initials,
will you understand that if I say "FOL"
throughout the questioning today, that I'm
referring to Floyd's of Leadville, also known
as Valued, Inc.?

A. Okay. F as like "Frank"?

Q. Like Floyd's, O is of, L is

1 Merle-Huet

2 Leadville?

3 A. Yes.

4 Q. Have you been deposed before?

5 A. Yes.

6 Q. And when were you deposed?

7 A. I don't remember.

8 Q. Have you been deposed more than one
9 time?

10 A. No.

11 Q. Do you remember when you were
12 deposed if it was in connection with a lawsuit
13 filed by Redemption Holdings in the State of
14 Colorado?

15 A. I don't recall.

16 THE VIDEOGRAPHER: I'm sorry to
17 interrupt, Counsel. I just wanted to
18 inform the witness. Because it's a video
19 deposition, you're being cut off on the
20 video. If you could adjust your camera
21 (indicating).

22 THE WITNESS: Okay.

23 THE VIDEOGRAPHER: There you go.

24 Thank you so much. Yes, much better.

25 Thank you.

Merle-Huet

BY MS. COLE:

Q. Did you do anything to prepare for
your deposition today?

A. Not that I'm aware of.

Q. Did you meet with anyone to discuss
the deposition before today?

A. No.

Q. Did you review any documents before
today?

A. No.

Q. Are you represented by counsel for
the purpose of this deposition this morning?

A. I think so.

Dan, are you on?

MR. VEDRA: I'm here.

THE WITNESS: Okay. Yes.

BY MS. COLE:

Q. So, Mr. Vedra is your counsel today
for purposes of the deposition?

A. I believe so, yes. But I never
quite know personal, you know, I'm not a
lawyer, so I don't know any of the
technicalities.

Q. And when did you engage him to

1 Merle-Huet

2 represent you for today?

3 A. That, I don't know.

4 Q. Are you paying Mr. Vedra to
5 represent you this morning for the deposition?

6 A. I'm not sure.

7 Q. Is Floyd's of Leadville paying for
8 Mr. Vedra's representation this morning?

9 A. I don't know.

10 Q. Are you familiar with the
11 allegations and claims asserted by Floyd's of
12 Leadville against Alexander Capital in this
13 litigation for which you're testifying this
14 morning?

15 A. I don't recall them.

16 Q. Have you read any of the pleadings
17 of the case?

18 A. No.

19 Q. You have a master's degree in
20 international affairs from Columbia University;
21 correct?

22 A. Yes.

23 Q. And you also have a bachelor's of
24 science degree in language from Georgetown; is
25 that correct?

Merle-Huet

A. Yes.

Q. Are you currently married to Floyd Landis?

A. I'm not sure about that.

Q. You're not sure if you're currently married to him?

A. No.

Q. Were you previously married to Floyd Landis?

A. I don't -- I'm not sure -- I'm unsure about that.

Q. You're unsure about whether you have ever been married to Floyd Landis?

A. Yes.

Q. Do you recall testifying in a deposition in 2022 that you and Mr. Landis were husband and wife?

A. I do not remember that.

Q. Are you currently employed?

A. I'm unsure.

Q. You're unsure whether you're currently employed?

A. I'm unsure.

Q. Can you explain that to me, how you

1 Merle-Huet

2 don't know whether you're employed or not?

3 A. I'm unsure.

4 Q. Do you have a job?

5 A. I don't know.

6 Q. Are you employed at the Federal
7 Reserve Bank of New York?

8 A. No.

9 Q. Were you employed at the Federal
10 Reserve Bank of New York?

11 A. When?

12 Q. At any time.

13 A. Yes.

14 Q. And when was the last time that you
15 were employed at the Federal Reserve Bank of
16 New York?

17 A. I don't recall.

18 Q. Were you employed there in 2022?

19 A. I don't recall.

20 Q. Do you recall testifying in a
21 deposition that you were employed at the
22 Federal Reserve Bank of New York in 2022?

23 A. I don't recall the details.

24 Q. Let's go through your employment
25 history, can you tell me about the first job

1 Merle-Huet

2 that you had after graduating with your
3 master's degree from Columbia University?

4 A. I don't remember that. That was a
5 very long time ago.

6 Q. Do you remember any places you have
7 worked since you graduated?

8 A. No. Except for the Federal
9 Reserve, which I just answered you I had worked
10 at.

11 Q. And how long did you work there?

12 A. I don't remember exactly.

13 Q. So, you don't recall whether you
14 started working at the Federal Reserve Bank
15 right after you got your master's degree from
16 Columbia?

17 A. No.

18 Q. What were your roles and
19 responsibilities at the Federal Reserve Bank of
20 New York?

21 A. I don't know what time period
22 you're referring to or when, so I don't know.

23 Q. I don't know what time period I'm
24 referring to either because you don't recall
25 when you were employed there. So, the last

1 Merle-Huet

2 time that you were employed there, what was
3 your last position there?

4 A. I don't recall.

5 Q. You don't recall what your position
6 was when you -- the last day of your employment
7 was at the Federal Reserve Bank of New York?

8 A. I'm unsure.

9 Q. You were formerly employed at
10 Floyd's of Leadville; correct?

11 A. I don't recall that.

12 Q. You don't recall ever being
13 employed at Floyd's of Leadville?

14 A. I'm not sure.

15 Q. You're not sure if you recall or
16 you're not sure if you were employed?

17 A. I'm unsure.

18 Q. About what?

19 A. What's your question?

20 Q. I asked you: Were you formerly
21 employed at Floyd's of Leadville?

22 A. And I'm unsure about that.

23 Q. Okay. Do you recall testifying
24 previously in 2022 that you were employed by
25 Floyd's of Leadville?

Merle-Huet

A. No.

Q. Do you recall ever testifying that you began your employment at Floyd's of Leadville in either the end of September 2018 or the beginning of October 2018?

A. No, I don't remember that.

Q. You don't remember testifying that or you don't remember whether that was true?

A. I don't remember testifying that.

Q. Were you employed with Floyd's of Leadville in September of 2018?

A. I'm unsure.

Q. Were you employed with Floyd's of Leadville in October of 2018?

A. I'm unsure.

Q. Did you ever advise Floyd's of Leadville in any capacity, regardless of whether you were employed with the company or not?

A. I'm unsure.

Q. Did you advise Floyd Landis on administrative things in connection with his company, Floyd's of Leadville?

A. I'm unsure.

Merle-Huet

Q. Were you ever the chief operating officer of Floyd's of Leadville?

A. I am unsure.

Q. If I were to show you documents showing that you were identified as the chief operating officer, would you have any reason to dispute that?

A. I don't know. I'd have to see the documents.

Q. Okay. Were you part of the executive team at Floyd's of Leadville?

A. I don't recall.

Q. Did you serve as president of Floyd's of Leadville at any time?

A. I'm unsure.

Q. I'm going to share with you a document that's been identified, that I have marked as Defendant's Exhibit 2 (indicating).

(Exhibit 2 was so marked for identification.)

BY MS. COLE:

Q. Would you let me know if you could see the exhibit?

A. It's hard to see.

Merle-Huet

Q. Is it too small for you to see it?

A. It's a little small.

Q. Is that better?

A. No, it didn't change.

THE VIDEOGRAPHER: Counsel, sorry,
if I may. In the exhibits, the witness
can zoom, as well.

THE WITNESS: Thank you, Mr. Ellis.
I see it.

THE VIDEOGRAPHER: You're welcome.

THE WITNESS: Okay.

BY MS. COLE:

Q. Are you able to zoom in on the
document so that you can read it?

A. Yes.

Q. Do you recognize the document
marked as Defendants' Exhibit 2?

A. No.

Q. Do you see here on the top third of
the page, it says "forwarded message from
Alexandra Merle" with the e-mail address
Alex@FloydsOfLeadville.com?

A. I can see that on the document.

Q. Is this an e-mail that you sent

1 Merle-Huet

2 from that e-mail address to
3 Tim@FloydsofLeadville.com on September 18th,
4 2018?

5 A. That, I don't know. I don't know.

6 Q. Do you have any reason to believe
7 that it's not an e-mail that you sent to
8 Tim@FloydsofLeadville.com on September the
9 18th?

10 A. I mean, I can think of a lot of
11 different ways that I didn't send an e-mail, so
12 I don't know if it was me.

13 Q. Do you have any reason to dispute
14 that you sent this e-mail?

15 A. Sure, somebody could have hacked
16 into my e-mail address.

17 Q. Have you ever been made aware that
18 someone hacked into your
19 Alex@FloydsofLeadville.com e-mail address?

20 A. They could have hacked into my
21 e-mail address and not made me aware of it.
22 That happens every day on the Internet.

23 Q. Right. I didn't ask if they made
24 you aware. I asked whether you were ever
25 aware?

1 Merle-Huet

2 A. I don't know.

3 Q. Did you have an e-mail address at
4 FloydsofLeadville.com?

5 A. I don't recall.

6 Q. You don't recall ever sending
7 e-mails or receiving e-mails?

8 A. I do not recall.

9 Q. Do you know who
10 Tim@FloydsofLeadville.com is?

11 A. I don't recall who that is.

12 Q. Is it Tim Kelly?

13 A. I don't know.

14 Q. Do you know who Tim Kelly is?

15 A. I don't know.

16 Q. You don't know who Tim Kelly is?

17 A. I said that three times. I do not
18 know who Tim Kelly is. I don't remember who
19 Tim Kelly is.

20 Q. Well, those are two different
21 things. So, I've asked if you knew him, so
22 either you know him or you don't remember him,
23 so you're saying that you don't remember him?

24 A. I don't remember knowing him.

25 Q. Could you please scroll to the

1 Merle-Huet

2 second page of this document (indicating)?

3 A. Okay.

4 Q. Do you recognize this document
5 which is the attachment to the e-mail we were
6 just looking at?

7 A. I do not.

8 Q. Have you ever seen a document like
9 this before?

10 A. I don't recall seeing one like this
11 before.

12 Q. Could you please take a look at
13 page 10 of this document (indicating)?

14 Are you at page 10?

15 A. Not yet.

16 Q. It's page 10 of the slide, but page
17 11 of the exhibit.

18 A. So, where am I supposed to be
19 looking?

20 Q. Do you see a document that has the
21 number 10 in the lower left corner?

22 A. No.

23 Q. Do you see a document that says
24 "the executive team" at the top?

25 A. Yes.

Merle-Huet

Q. Do you see your name second from the top here in the list of names?

A. I see Alexandra Merle.

Q. And what does it say besides the name?

A. It says, "President and Chief Operating Officer."

Q. Were you the president and chief operating officer of Lloyd's of Leadville on September 18th, 2018?

A. I'm unsure.

Q. Can you think of a reason why this document would identify you as the president and chief operating office of Lloyd's of Leadville if you were, in fact, not the president or chief operating officer?

A. I don't know, I don't know.

Q. Okay. I am going to show you an exhibit marked as Defendants' Exhibit 4.

(Exhibit 4 was so marked for identification.)

BY MS. COLE:

Q. And if you need to zoom in on the document so that you can see it better and read

Merle-Huet

it, please do so.

MR. VEDRA: Are we skipping Exhibit
3?

MS. COLE: Yeah, we used Exhibit 3
in the Grella deposition.

MR. VEDRA: Which deposition?

MS. COLE: Gary Grella.

MR. VEDRA: Okay. Thank you.

MS. COLE: You're welcome.

BY MS. COLE:

Q. Are you able to see Defendants'
Exhibit 4?

A. Yes.

Q. Do you recognize the document
marked as Exhibit 4?

A. I do not.

Q. Is it an e-mail that you sent on
February 5th, 2019 with the subject line "FOL
Debt"?

A. I'm unsure.

Q. You're unsure?

A. I'm unsure.

Q. I can't hear you very well. I
can't tell if you're saying I'm sure or unsure,

1 Merle-Huet

2 I'm just trying to clarify.

3 A. Okay. I am not sure.

4 Q. Okay. Thank you. Do you have any
5 reason to believe that you did not send this
6 e-mail on this date?

7 A. I'm unsure.

8 Q. You're unsure if you have a reason?

9 A. Correct.

10 Q. So, you don't have a reason to
11 dispute it?

12 A. I'm unsure how to answer your
13 question.

14 Q. Do you have a reason to believe
15 that this is not an e-mail that you sent on
16 February 7th, 2019?

17 A. I don't know.

18 Q. So, you cannot identify a reason
19 that you did not send this e-mail; is that
20 correct?

21 MR. VEDRA: Objection to form.

22 THE WITNESS: I can or cannot. I
23 don't know.

24 BY MS. COLE:

25 Q. Well, if you can, would you please

Merle-Huet

do so?

A. If I can what?

Q. You said you can or you cannot, but if you can, would you please provide a reason?

A. A reason for?

Q. Why you would not have sent this e-mail, since you say you do not recognize it today?

A. I don't know.

Q. Can I get you to go to the second page of this document, please (indicating)?

A. Okay.

Q. Do you recognize the document which is attached to the e-mail we were just looking at?

A. I do not.

Q. Could you please go to page 15 of this document?

A. Okay.

Q. Do you see page 15 that says "the executive team" at the top of the page?

A. Yes.

Q. Do you see your name second from the top of the list of three names there?

Merle-Huet

A. I see Alexandra Merle.

Q. What does it say beside your name?

A. "President and Chief Operating
Officer."

Q. Were you the president and chief
operating officer of Floyd's of Leadville on
February 5th, 2019?

A. I'm unsure.

Q. Did you create this deck?

A. I do not recall.

Q. Did you participate in the creation
of this deck?

A. I do not recall.

Q. Do you recall whether you had any
input into the content of the deck?

A. I do not.

Q. I'm going to show you an exhibit
marked as Defendants' Exhibit 4A (indicating).

(Exhibit 4A was so marked for
identification.)

BY MS. COLE:

Q. And you can zoom in on this exhibit
once you have it in front of you, so that you
can see it clear enough to read from it, and

1 Merle-Huet

2 then let me know when you're ready.

3 A. Okay.

4 Q. I will represent to you that this
5 is the metadata for the document that we were
6 just looking at as Exhibit 4.

7 Do you see on the fifth line down, it
8 states that the document's last author to be
9 Merle-Huet -- Alex Merle, I'm sorry.

10 A. No.

11 MR. VEDRA: Objection; foundation.

12 BY MS. COLE:

13 Q. Do you see where it says,
14 "Production date start"?

15 A. No.

16 Q. At the top, very top of the
17 document, metadata for Exhibit 4, right under
18 that, it says, "Production date start"?

19 A. Yes.

20 Q. And then under that it says,
21 "e-mail sent."

22 Do you see that?

23 A. Yes.

24 Q. Under that, it says "E-mail
25 received."

Merle-Huet

Do you see that?

A. Yes.

Q. Under that, it says, "Document
title."

Do you see that?

A. Yes.

Q. And under that, it says, "Document
last author," what does it say there?

A. It says, "Alex Merle."

Q. Does this refresh your recollection
at all whether or not you created or modified
the document marked as Exhibit 4 that we were
looking at?

MR. VEDRA: Objection to form and
foundation.

THE WITNESS: Definitely not.

BY MS. COLE:

Q. I'm going to show you an exhibit
marked as Defendants' Exhibit 5.

(Exhibit 5 was so marked for
identification.)

BY MS. COLE:

Q. And again, you can zoom in so that
you're able to read this.

Merle-Huet

Do you recognize the document marked
as Exhibit 5?

A. No.

Q. Does it look like an e-mail that
you sent to Jonathan Gazdak on April 16th of
2020 with the subject, "Recent Presentation"?

A. I'm unsure.

Q. You're unsure if it looks like an
e-mail?

A. Was that the question before?

Q. It was.

A. I'm unsure.

Q. Do you know what an e-mail looks
like?

A. I'm unsure.

Q. Do you have any reason to believe
that this is not an e-mail that you sent to
Jonathan Gazdak on April the 16th of 2020?

A. I'm unsure. I don't have a way to
verify a document here. I don't know.

Q. Who is Chris Ryan?

A. I'm unsure.

Q. You don't know who Chris Ryan is?

A. I'm unsure.

Merle-Huet

Q. Have you ever met Chris Ryan?

A. Unsure.

Q. Do you know who Floyd Landis is?

A. I'm unsure.

MS. COLE: Let's take a break and go
off the record for a few minutes. So,
we'll take a five-minute break.

THE VIDEOGRAPHER: Off the record.
The time is 12:39.

(Recess taken.)

THE VIDEOGRAPHER: We are back on
the record. The time is 12:47.

(Discussion off the record.)

BY MS. COLE:

Q. Ms. Merle-Huet, is there any reason
that you cannot testify fully and truthfully
today?

A. Not that I know of except for sound
issues if I mishear your questions.

Q. Do you have any health issues today
that would impede your ability to recollect
events and testify to them truthfully?

A. Not that I'm aware of. I don't
know.

Merle-Huet

Q. Are you on any medications today that would impede your ability to recollect events and testify to them truthfully?

A. I mean, unless there are side effects I'm not aware of, I don't know.

Q. Have you ever had issues remembering things based on the medications you're currently taking?

A. I wouldn't know. I don't know.

Q. You wouldn't know if you had issues with your memory before today?

A. No.

Q. I'm sorry to pry into your personal health. What medications are there, that you were not sure about the side effects?

A. I don't know.

Q. You don't know what medications you're taking?

A. No.

Q. Are you taking any medication?

A. I'm not sure. I'm unsure.

Q. Did you take any medication this morning?

A. Not that I remember.

1 Merle-Huet

2 Q. Do you know any person by the name
3 of Floyd Landis?

4 A. Yes.

5 Q. And how do you know a person by the
6 name of Floyd Landis?

7 A. I don't recall how I know him, but
8 I know him.

9 Q. And in what context do you know
10 him?

11 A. I'm not sure what that means, "in
12 what context."

13 Q. Well, when you say you know a
14 person named Floyd Landis, what is that answer
15 based on?

16 A. Knowing him.

17 Q. And how do you know him?

18 A. I know him in different ways.

19 Q. Tell me about those ways.

20 A. I know him as a person.

21 Q. How do you know him as a person?

22 A. I'm not sure what you're getting
23 at. I don't understand question.

24 Q. You don't understand what it means
25 to know someone, how you know someone?

Merle-Huet

A. No.

Q. Have you met a person named Floyd Landis?

A. I have.

Q. And where did you meet this person named Floyd Landis?

A. I don't recall.

Q. The person that you know as Floyd Landis, was he an athlete in cycling?

A. I'm unsure, but he was a cyclist.

Q. So, that was my question. So, he is a cyclist, is that the Floyd Landis that you know?

A. He was a cyclist.

Q. Are you married to this Floyd Landis?

A. I don't know.

Q. How is it that you don't know whether you're married to someone?

A. Because there is different ways of being married in different states.

Q. Okay. Are you married to Floyd Landis in any way?

A. I'm unsure.

Merle-Huet

Q. When you said there's different ways to be married, what are those ways?

A. So, I believe that if you live with someone for a long time in certain states, there's -- and you become married somehow, but I'm not sure how it works.

Q. Have you ever lived with Floyd Landis?

A. I have.

Q. And what state do you live with him?

A. I don't live with him now.

Q. Okay. When did you live with him?

A. I don't recall when it was.

Q. Do you recall how long you lived with him?

A. No.

Q. What are the other ways that you could be married to someone?

A. I'm unsure.

Q. Well, you testified there are multiple ways, so do you know more than one way?

A. No, I'm unsure.

Merle-Huet

Q. Do you live alone right now?

A. No.

Q. Who do you live with now?

A. My dog and my daughter.

Q. And who is the father of your
daughter?

A. I'm unsure, I never verified that.

Q. Who does your daughter think is her
father?

A. I don't know what she thinks.

Q. Your daughter does not know who her
father is?

A. I'm unsure.

Q. When you lived with Mr. Landis, was
that more than five years?

A. I don't recall.

Q. Did you live with him more than a
day?

A. I don't recall.

Q. Do you know what Floyd's of
Leadville is?

A. Unsure.

Q. You're unsure?

A. Unsure.

Merle-Huet

Q. Have you ever been to Leadville,
Colorado?

A. I don't recall.

Q. Do you know who Frank DiMartini is?

A. Unsure.

Q. Do you know a person by the name of
Frank DiMartini?

A. Unsure.

Q. Do you know a person with the name
Chris Ryan?

A. Unsure.

Q. Have you ever met a person named
Chris Ryan?

A. Was that the same question as
before?

Q. I'll phrase it differently. Have
you ever met a person by the name of Chris
Ryan?

A. Unsure.

Q. Have you ever been to the State of
Colorado?

A. I don't recall.

Q. Have you ever had a wedding
ceremony in which you were the bride?

1 Merle-Huet

2 A. What time frame?

3 Q. Any time frame.

4 A. Yes.

5 Q. When was that?

6 A. I'm not sure what the dates were.

7 Long time ago.

8 Q. Who was the groom at that wedding
9 ceremony?

10 A. Jean-Michel Huet.

11 Q. And did you get divorced from
12 Mr. Huet?

13 A. I did.

14 Q. When was that?

15 A. I don't remember.

16 Q. Was it a long time ago?

17 A. I'm not sure.

18 Q. Well, you said the wedding was a
19 long time ago, so I was just trying to figure
20 out if the divorce was also a long time ago.

21 You don't recall exactly?

22 A. No.

23 Q. Are you familiar with the
24 investment banking firm Alexander Capital that
25 is named as a defendant in this lawsuit?

1 Merle-Huet

2 A. Unsure.

3 Q. Do you have any understanding why
4 you were subpoenaed to testify in this case
5 today?

6 A. No.

7 Q. Is it your understanding that
8 Mr. Vedra accepted service of a subpoena on
9 your behalf?

10 A. I don't know.

11 Q. Do you have an understanding of why
12 he would do so?

13 A. I think yes, if he got a subpoena,
14 then he has to accept it.

15 Q. Well, the subpoena was not to him.
16 Have you had a wedding ceremony with any other
17 individual than Mr. Huet?

18 A. No.

19 Q. I'm sorry, I don't remember your
20 answer to one of my recent questions. I'm just
21 going to repeat it, I apologize for that. But
22 are you familiar with an investment banking
23 company called Alexander Capital?

24 A. Unsure.

25 Q. Have you ever heard of the

1 Merle-Huet
2 investment banking company Alexander Capital
3 LP?

4 A. I don't recall.

5 Q. Did you and Floyd Landis ever
6 discuss proposed terms for a capital raise for
7 Floyd's of Leadville with Alexander Capital in
8 October or November of 2017?

9 MR. VEDRA: Objection; foundation.

10 THE WITNESS: I don't recall.

11 BY MS. COLE:

12 Q. Did you and Frank DiMartini ever
13 discuss proposed terms for a capital raise for
14 Floyd's of Leadville in October or November
15 2017?

16 MR. VEDRA: Same objection.

17 THE WITNESS: I don't recall.

18 BY MS. COLE:

19 Q. Do you know someone by the name of
20 Peter DiChiara?

21 A. Unsure.

22 Q. Do you recall whether you had any
23 discussions about the proposed terms of a
24 capital raise for Floyd's of Leadville with
25 Peter DiChiara?

Merle-Huet

A. I don't recall.

Q. Do you know if Peter DiChiara was an attorney representing Floyd's of Leadville in connection with a capital raise from 2017 through 2019?

A. No.

Q. Are you aware that Floyd's of Leadville raised capital from 2017 to 2019 in the form of senior secured promissory notes?

A. Unsure.

Q. Do you know what a senior secured promissory note is?

A. No.

Q. Do you know what a promissory note is?

A. No.

Q. Have you ever heard the term "promissory note"?

A. I have.

Q. In what context have you heard the term promissory note?

A. I don't remember.

Q. Do you have an understanding of what a promissory note is?

Merle-Huet

A. I don't know.

Q. Do you have a mortgage on your
home?

A. Yes.

Q. And is it your understanding that a
mortgage is a loan?

A. I'm not sure.

MR. VEDRA: Objection; form and
foundation.

BY MS. COLE:

Q. You're not sure whether a mortgage
is a loan?

A. I'm not sure.

Q. Are you aware that Floyd's of
Leadville received over \$4 million in capital
raised from 2017 to 2019?

MR. VEDRA: Objection; form and
foundation.

THE WITNESS: I don't recall.

BY MS. COLE:

Q. I'm going to show you a document
that I have marked as Defendants' Exhibit 6
(indicating).

(Exhibit 6 was so marked for

Merle-Huet

identification.)

BY MS. COLE:

Q. Do you recognize the document
marked as Exhibit 6?

A. I have to zoom in. No.

Q. Do you know a person by the name of
Kirill Nikonov; N-I-K-O-N-O-V?

A. I'm not sure.

Q. Is this an e-mail from an
individual named Kirill Nikonov@CMDLLP.com to
Frank DiMartini, and then CCing other
individuals, including
Alex.Merle@FloydsofLeadville.com?

A. I mean, that's what the words on
the page say, but I can't verify where this
comes from or if this is a real e-mail, so no,
I don't know for sure.

Q. So, you don't recall receiving this
e-mail; is that correct?

A. I don't recall.

Q. Was
Alex.Merle@FloydsofLeadville.com ever your
e-mail address?

A. I'm not sure.

Merle-Huet

Q. How many e-mail addresses do you have?

A. I don't know.

Q. Do you have more than one e-mail address?

A. I think so.

Q. Is it possible that you had an e-mail address

Alex.Merle@FloydsofLeadville.com?

A. I'm unsure.

Q. Do you have a reason to believe that you did not receive this e-mail on December 21st, 2018?

A. I can't attest as to whether or not I got this e-mail. I don't know.

Q. Do you know the reason why you would not have received this e-mail?

A. It could have bounced back. I have no way of knowing that. I don't know.

Q. So, it could have bounced back. Does that mean that you had an Alex.Merle@FloydsofLeadville.com e-mail address from which this e-mail could have bounced back from?

1 Merle-Huet

2 A. Well, if it's not an e-mail
3 address, then it would have bounced back.

4 Q. What are your current e-mail
5 addresses?

6 A. I'm not sure.

7 Q. Can you tell me one?

8 A. I have AlexMerleHuet@Hotmail.com.

9 Q. Is that the e-mail address that you
10 use primarily to send electronic
11 communications?

12 A. No.

13 Q. What is the e-mail address that you
14 use primarily to send electronic
15 communications?

16 A. I'm not sure.

17 Q. So, you remember the Hotmail e-mail
18 address even though it's not the one you use
19 primarily, but you don't remember the address
20 of the e-mail that you do use primarily?

21 A. Correct.

22 Q. Do you recall any other e-mail
23 addresses other than the AlexMerleHuet@Hotmail
24 e-mail address?

25 A. I don't recall.

Merle-Huet

Q. Do you have more than one e-mail address?

A. Probably.

Q. Did you create more than one e-mail address?

A. I think so.

Q. Do you recall, other than the Hotmail, any of the other e-mail addresses that you have created?

A. No.

Q. When was the last time you sent an e-mail?

A. The last time, I don't know.

Q. Did you send an e-mail yesterday?

A. Maybe. I don't know.

Q. I'm going to show you a document I marked as Exhibit 7 (indicating).

(Exhibit 7 was so marked for identification.)

BY MS. COLE:

Q. Can you see the document?

A. Yes.

Q. And does this look like an e-mail sent from the e-mail address

1 Merle-Huet

2 Alex@FloydsOfLeadville.com?

3 A. I don't know. It's hard for me to
4 verify. I don't know if you just typed it in
5 on a piece of paper or where it comes from. I
6 don't know.

7 Q. I just asked you if it looks like
8 an e-mail. I didn't ask you to verify where it
9 came from or whether I created it for purposes
10 of this deposition.

11 Does it look like an e-mail to you?

12 A. I'm not sure.

13 Q. Have you ever seen an e-mail?

14 A. I have.

15 Q. Does this look like an e-mail you
16 ever sent?

17 A. I'm not sure.

18 Q. Have you ever printed out an
19 e-mail?

20 A. Not that I remember.

21 Q. Did you go by Alexandra as your
22 first name?

23 A. No.

24 Q. What do you go by?

25 A. Alex.

Merle-Huet

Q. So, is it possible that you sent this e-mail that's signed Alex?

A. Maybe. I'm not sure.

Q. So, you acknowledge that you might have sent this e-mail; is that correct?

A. No.

Q. So, what did you mean by "maybe"?

A. I said unsure.

Q. When you said "maybe," are you changing that answer now to unsure?

A. Maybe could be unsure. I'm not sure. So, could be maybe. I don't know.

Q. Do you have any reason to believe other than you think I might have created this document, but this is not an e-mail that you sent from Alex@FloydsOfLeadville.com?

A. Unsure.

Q. So, you're unsure if there's a reason you can think of or you don't have a reason?

A. I'm unsure of a reason.

Q. Have you sent any e-mails today?

A. Not that I know of.

Q. How did you communicate to Mr.

1 Merle-Huet

2 Vedra that you could only participate in this
3 deposition until 1:30?

4 A. We talked on the phone.

5 Q. How long did you talk on the phone?

6 A. I do not know.

7 Q. Was it more than one minute?

8 A. I don't know.

9 Q. Did you communicate -- and I don't
10 want to know the contents of it, but did you
11 communicate anything other than the fact that
12 you needed to stop at 1:30 today?

13 A. Well, if I can't tell you what I
14 said to him, then I'm not sure how to answer
15 your question.

16 Q. You can tell me if you discussed
17 anything else with a yes or no answer?

18 A. Okay. So, can you please repeat
19 the question?

20 Q. Okay. So, you said that you spoke
21 with Mr. Vedra on the phone today to
22 communicate to him that you needed to stop at
23 1:30 today; is that correct?

24 A. Yes.

25 Q. Did you communicate -- did you

1 Merle-Huet

2 discuss anything else with Mr. Vedra during
3 that phone call? Just yes or no?

4 A. I don't remember.

5 Q. What time did you speak with him on
6 the phone today?

7 A. I didn't look at the time. I don't
8 know.

9 Q. Was it this morning or was it an
10 hour before we were supposed to log on at
11 11:30? Do you have any sense of the time?

12 A. What time zone are you asking
13 about?

14 Q. Well, you're in Eastern Daylight
15 time zone; correct?

16 A. I am.

17 Q. So, right now, it's 1:11 p.m.;
18 right?

19 A. Yes.

20 Q. And so, the deposition was
21 scheduled to begin at 11:30 a.m.; correct?

22 A. That's what I was told.

23 Q. So, about how far in advance of the
24 deposition did you have this phone call with
25 Mr. Vedra?

Merle-Huet

A. I don't remember. I didn't look at the time, I cannot answer your question.

Q. What time did you wake up this morning?

A. 6:41.

Q. What time did you eat breakfast?

A. I didn't look at the time. I don't know.

Q. What time do you normally eat breakfast?

A. Depends on the day.

Q. Did you eat breakfast today?

A. I did.

Q. Do you take your daughter to school?

A. Sometimes.

Q. Did you take your daughter to school today?

A. I did.

Q. What time does she go to school?

MR. VEDRA: I'm going to object on relevance grounds.

MS. COLE: I'm trying to get a sense of how long this communication was

1 Merle-Huet

2 because she can't tell me what time she
3 made it, so I'm trying to pin her down on
4 the time.

5 MR. VEDRA: So, I'm sorry, but how
6 is what she had for breakfast or when she
7 ate it relevant to any fact of
8 consequence in this case.

9 MS. COLE: I'm trying to refresh her
10 recollection as to what time she might
11 have placed the phone call to you, Dan.

12 MR. VEDRA: And how is that
13 relevant?

14 MS. COLE: Are you objecting to
15 form?

16 MR. VEDRA: I am.

17 MS. COLE: Okay. Well, objections
18 based on relevance aren't proper for
19 depositions, so we're going to move on.

20 MR. VEDRA: You're going to move on?

21 MS. COLE: Yes, I'm the one taking
22 the deposition.

23 MR. VEDRA: Okay. Let's stop
24 talking about breakfast.

25 THE WITNESS: I mean, I'm happy to

Merle-Huet

talk about breakfast all you want, if
that's what you want to talk about.

BY MS. COLE:

Q. So, I think I pulled up Exhibit 7.
Do you have that in front of you?

A. I don't know what exhibit number
this is.

Q. There's a sticker at the bottom
that's yellow, that says "DEF-7" --

A. Yes.

Q. -- do you see that?

A. Yes.

Q. Can you go to the second page of
the document, please?

A. Okay.

Q. Do you recognize this document?

A. No.

Q. Have you ever seen a document like
this?

A. Not that I recall.

Q. Do you know -- taking a look at
line 1, does this look like a spreadsheet to
you?

A. It could be a Word document, it

1 Merle-Huet

2 could be in PowerPoint or it could be in Excel,
3 or it could be in Google Docs, I'm not sure
4 what you mean by "spreadsheet."

5 Q. Okay. Where it says at the top
6 number, and then there's a row that says number
7 1, do you see that?

8 A. Yes.

9 Q. And then there's a column for date
10 beside that, and then a column for subscriber,
11 do you see that?

12 A. Yes.

13 Q. And under subscriber, it says
14 "3DDD."

15 Do you know what "3DDD" is?

16 A. No, I do not.

17 Q. Have you ever heard of "3DDD"?

18 A. I don't recall.

19 Q. Do you know a person by the name of
20 Greg Hurley?

21 A. I don't recall.

22 Q. Do you know a person by the name of
23 Howard DiSilva?

24 A. Unsure.

25 Q. Have you ever heard of an entity by

1 Merle-Huet

2 the name of Redemption Holdings?

3 A. Unsure.

4 Q. Do you recall being named as a
5 defendant personally on a lawsuit filed by
6 Redemption Holdings against you and others in
7 Colorado?

8 A. No, I don't recall. I think the
9 name -- what was the first name you asked me
10 about?

11 Q. Greg Hurley?

12 A. He may -- I may remember his name
13 because he was a pedophile, so I think that
14 that's why I remember his name.

15 Q. And what information did you have
16 personal knowledge of that causes you to
17 believe that a person by the name of Greg
18 Hurley is a pedophile?

19 A. I remember reading he was arrested,
20 and it was some sort of court document.

21 Q. And under what circumstances caused
22 you to be reading court documents about Greg
23 Hurley?

24 A. Well, that, I don't recall.

25 Q. When did you read those documents?

1 Merle-Huet

2 A. I don't remember that.

3 Q. Do you have any reason to dispute
4 that Redemption Holdings Incorporated filed a
5 lawsuit against you personally in the State of
6 Colorado?

7 A. I don't remember, so I can't -- I'm
8 not sure what I would dispute.

9 Q. But other than your memory, do have
10 any reason to dispute that you were personally
11 a defendant in a lawsuit in Colorado filed by
12 Redemption Holdings Incorporated?

13 A. I don't understand your question if
14 I don't remember.

15 Q. I'm asking if there is a reason why
16 you don't remember or a reason why you would
17 dispute that. Have you ever been sued?

18 A. I don't know.

19 Q. Has anyone ever filed a lawsuit
20 against you?

21 A. I don't recall.

22 Q. Have you had to hire a lawyer to
23 represent you?

24 A. I'm unsure.

25 Q. Did you go to court when you got

1 Merle-Huet

2 divorced from Mr. Huet?

3 A. Not that I remember.

4 Q. Have you ever signed any check on
5 behalf of Floyd's of Leadville, Incorporated?

6 A. I don't know.

7 Q. Have you ever signed any checks on
8 behalf of Valued Incorporated?

9 A. I don't know.

10 Q. Have you ever loaned money to
11 Floyd's of Leadville, Incorporated?

12 A. I don't know. Not that I'm aware
13 of.

14 Q. So, you're not aware that you
15 loaned \$100,000 to Floyd's of Leadville,
16 Incorporated?

17 A. I'm not aware. I don't remember.

18 Q. Do you recall signing personal
19 checks? Have you ever signed a personal check?

20 A. Have I ever what a personal check?

21 Q. Signed a personal check?

22 A. I have signed a personal check.

23 Q. You have a checking account?

24 A. I have a checking account, yes.

25 Q. When was the last time you signed a

Merle-Huet

personal check from your checking account?

A. I have not checked. I don't know.

Q. I'm going to show you a document that has been marked as Defendants' Exhibit 8 (indicating).

(Exhibit 8 was so marked for identification.)

BY MS. COLE:

Q. And you can zoom in so you can see this document. Do you recognize this document that I'm showing you that's been marked as Defendants' Exhibit 8?

A. I don't see a document. I just see -- I see a list, just Exhibit DEF-7, Exhibit DEF-6.

THE SPEAKER: It just came up.

THE WITNESS: Okay.

BY MS. COLE:

Q. Do you see a document that's got a sticker at the bottom, a yellow sticker that says DEF-8?

A. Yes.

Q. Do you recognize this document marked as Exhibit 8?

Merle-Huet

A. No.

Q. Do you see at the top, there is some text that says "from," then "sent," then "to," then "CC"?

A. I do.

Q. Do you see where -- in the line that says "CC," it identifies Alex@FloydsofLeadville.com and FloydLandis@FloydsofLeadville.com.

A. I see those words written down.

Q. Have you ever sent an e-mail to FloydLandis@FloydsofLeadville.com?

A. I don't recall.

Q. Is it possible that you sent an e-mail to Mr. Landis at that e-mail address?

A. If I don't recall, I don't know.

Q. Can you think of any reason why you would have sent an e-mail to Floyd Landis at that e-mail address?

A. Not right now.

Q. The Floyd Landis that you know, that you testified a few moments ago that you know, does he have an affiliation with a company FloydsofLeadville.com?

Merle-Huet

A. I don't know.

Q. I'm sorry, Floyd's of Leadville,
Incorporated?

A. I don't know.

(Discussion off the record.)

BY MS. COLE:

Q. Looking down a little bit below
midway on this page, do you see where it says
"Pete," and then "please see below and let me
know if you have any questions," do you see
where I'm talking about on this page?

A. No.

Q. In the middle of the page?

A. Which page?

Q. Do you have Defendants' Exhibit 8
open in front of you?

A. Correct.

Q. Do you see on the middle of the
page the word Pete, comma?

A. Pete, comma? No, I don't see Pete,
comma. Can you zoom in? It's not a zoom
issue -- oh, I see please, Pete -- oh, Pete,
comma, yes.

Q. Under Pete, comma, it says, "Please

1 Merle-Huet

2 see below and let me know if you have any
3 questions." And then under that, there is some
4 sentences that start with the word "note," and
5 then a number.

6 Do you see that?

7 A. Yes.

8 Q. And the second sentence that starts
9 with "note," it says, "Note 35 and 63," and it
10 says "Greg Hurley." Is this the Greg Hurley
11 that you said you recognize the name for?

12 A. There's no way for me to know that.

13 Q. Okay. Well, when I asked you
14 earlier if you knew a Greg Hurley, that's what
15 you said. And so, I'm asking you about him in
16 connection with this case. And here, we see
17 his name on a document. So, I'm just curious
18 why you would be reading court documents about
19 Greg Hurley if it wasn't because of his
20 connections with this case --

21 A. Okay. You said that's what I said.
22 What did I say that you were just referring to?

23 Q. You said that you had heard of an
24 individual named Greg Hurley when I asked you
25 about the Redemption Holdings, Incorporated

Merle-Huet

lawsuit.

A. Yes, Greg Hurley, the pedophile.

Q. Do you have personal knowledge that Greg Hurley is a pedophile?

A. No, unless I believed the court documents, which should be true.

Q. Can you go to the second page of this document, please (indicating)?

A. Okay.

Q. And actually, if you wouldn't mind, going to page 5.

Are you at page 5?

A. I'm not sure which one is page 5. They're not numbered.

Q. So, in the viewer for the exhibit, if you hover at the bottom, there is arrows like you would have like maybe an Adobe, and you can scroll back and forth between pages and it tells you how many pages there are, so it says 5 of 6 -- if you hover at the bottom.

Do you see that now?

A. Yes.

Q. Do you recognize this document?

A. No.

Merle-Huet

Q. Have you ever heard of a person
named Jonathan Gazdak?

A. Unsure.

Q. Have you ever communicated with a
person by the name of Jonathan Gazdak?

A. I don't recall.

Q. I'm going to show you an exhibit
that's been marked as Defendants' Exhibit 9
(indicating).

(Exhibit 9 was so marked for
identification.)

BY MS. COLE:

Q. Is this an e-mail from Peter
DiChiara on April 22nd, 2019 -- I'm sorry.

Do you recognize this document that's
marked as Defendants' Exhibit 9?

A. I do not.

Q. Is it an e-mail from Peter DiChiara
to Floyd@FloydsofLeadville, Frank DiMartini and
AlexandraMerle@FloydsofLeadville.com?

A. I can't confirm whether this is an
e-mail, or it was an e-mail. I don't know.

Q. Do you recall receiving this e-mail
on April of 2019?

1 Merle-Huet

2 A. No, I do not recall.

3 Q. Were you an employee of Floyd's of
4 Leadville on April 22nd, 2019?

5 A. I don't recall.

6 Q. Is there a document that I could
7 show you that would help you recall when you
8 were employed at FloydsofLeadville.com -- at
9 Floyd's of Leadville, Inc.?

10 A. I'm not sure.

11 MS. COLE: It's two minutes to 1:30
12 and because you indicated you needed to stop,
13 we'll go ahead and adjourn for the day. And we
14 will discuss with Mr. Vedra whether or not
15 you're available to come back later today or on
16 some other date.

17 THE VIDEOGRAPHER: Before we go off
18 the record, would anyone like to order a
19 copy of today's transcript or video at
20 this time?

21 MS. COLE: We would like a copy of
22 the transcript and the video.

23 THE VIDEOGRAPHER: Synced video
24 transcript?

25 MS. COLE: Yes.

Merle-Huet

THE VIDEOGRAPHER: Okay. Any other
orders at this time, Mr. Vedra?

MR. VEDRA: We'd like to read and
sign. I'll let you know if we're going
to order after that.

THE VIDEOGRAPHER: Mr. Rachmuth?

MR. RACHMUTH: No copy for me.

THE VIDEOGRAPHER: Thank you.

I'm sorry. Mr. Ward.

MR. WARD: Nothing to add. Thank
you.

THE VIDEOGRAPHER: We are now going
off the record on September 4th, 2024, at
1:29 p.m., Eastern Time.

(Whereupon, at 1:29 p.m. the matter
was concluded.)

ALEXANDRA MERLE-HUET

Subscribed and sworn to before me
this ____ day of _____, 20____.

NOTARY PUBLIC

I N D E X

WITNESS	EXAMINATION BY	PAGE
MS. MERLE-HUET	COLE / DIRECT	6

EXHIBITS

DEFENDANT'S	DESCRIPTION	PAGE
Exhibit 2	9/18/18 e-mail	15
Exhibit 4	2/5/19 e-mail	20
Exhibit 4A	Metadata for Exhibit 4	24
Exhibit 5	4/16/20 e-mail	26
Exhibit 6	Nikonov e-mail	39
Exhibit 7	E-mail	43
Exhibit 8	E-mail	55
Exhibit 9	4/22/19 e-mail	60

(The exhibits were retained Attorney Cole.)

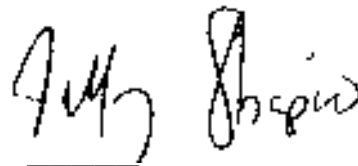
C E R T I F I C A T I O N

I, Jeffrey Shapiro, a Stenographic Reporter and Notary Public, within and for the State of New York, do hereby certify:

That ALEXANDRA MERLE-HUET, the witness whose examination is hereinbefore set forth, was first duly sworn by me, and that transcript of said testimony is a true record of the testimony given by said witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 12th day of September, 2024.



JEFFREY SHAPIRO

DEPOSITION ERRATA SHEET

Our Assignment No. J11628823

Case Caption: FLOYD'S OF LEADVILLE vs.
ALEXANDER CAPITAL

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury
that I have read the entire transcript of
my Deposition taken in the captioned
matter or the same has been read to me,
and the same is true and accurate, save
and except for changes and/or
corrections, if any, as indicated by me
on the DEPOSITION ERRATA SHEET hereof,
with the understanding that I offer these
changes as if still under oath.

Alexandra Merle-Huet

Subscribed and sworn to on the _____ day of
_____, 20____ before me,

Notary Public,
In and for the State of _____

DEPOSITION ERRATA SHEET

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

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SIGNATURE: _____ DATE: _____

Alexandra Merle-Huet

DEPOSITION ERRATA SHEET

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SIGNATURE: _____ DATE: _____

Alexandra Merle-Huet